

Western Power Trading Forum Comments on Imbalance Conformance Enhancements Draft Final Proposal

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About the Western Power Trading Forum

The Western Power Trading Forum (WPTF) is a California nonprofit, public benefit corporation. It is a broad-based membership organization dedicated to enhancing competition in Western electric markets while maintaining the current high level of system reliability. WPTF supports uniform rules and transparency in order to facilitate transactions among market participants. The membership of WPTF includes load serving entities, energy service providers, scheduling coordinators, generators, power marketers, financial institutions, and public utilities, all of which participate actively in the California market and other such markets in the West and across the country.

Comments

WPTF thanks for their speedy work on this initiative and supports the changes in the draft final proposal. WPTF fully supports the CAISO's commitment to make improvements to operator conformance procedures and improve transparency on the conformance process in the ISO BAA. This hopefully will shed additional light on any conformance actions that are due to market shortcomings and lead the CAISO to take action to automate or update the market to address any predictable, systematic conformance.

WPTF also fully supports the CAISO committing to file tariff language on the conformance limiter tool and is somewhat supportive of concurrently committing to remove the limiter from the real-time market within two years.

WPTF remains only partially convinced by the CAISO's arguments that they need two years because of operator challenges. For example, the paper notes operators are putting in 500 MW in one interval when they really mean 500 MW over the next 4 intervals. Why can't they simply input 125 MW into each of the next 4 intervals? The idea that they don't have time seems unlikely in most scenarios. Similarly the CAISO remains unconvinced that operators need to round and that this leads to over-estimates. It seems like a pocket calculator and some operator training may solve this issue. WPTF understands that in an emergency, there are time constraints, but as of right now the operators conform the load in almost every interval. It seems like they can be told to be more precise in an action they take consistently throughout each day.

That said, WPTF remains supportive of the overall intention of the proposal to make conformance more precise and remove the limiter.